

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

In re
UNITED STATES OF AMERICA

Plaintiffs,

Docket No. 3:22CR303

vs.

ADRIAN TAYLOR

Defendant.

UNOPPOSED MOTION TO CONTINUE DOCKET CALL

NOW COMES Defendant, through undersigned counsel, and moves this Court to continue this matter which is currently scheduled for trial during the May Trial Term. Counsel makes this motion based on a need for additional time to continue to attempt to resolve disputing sentencing issues with the Government, as well as due to the continued need for the Defendant to address medical issues in his home. In support of the motion Defendant shows as follows:

1. Defendant made his initial appearance on December 19, 2022, and was arraigned on December 22, 2022. Because the case would be scheduled for a docket call 11 days later, the magistrate Court allowed an oral motion to continue, and the matter was continued until March 6, 2023. Defendant sought and received one additional continuance to review discovery.
2. The discovery is significant, and contains forensic reports, interviews, and other evidence.
3. The Defense and the Government have engaged in good faith discussions regarding the case and potential resolutions. However, certain guideline provisions remain unresolved, and additional forensic review of evidence is necessary to resolve the issue.

4. Additionally, Defendant and Counsel have been somewhat limited in their ability to continue to discuss the case on account of serious health issues within Defendant's household.
5. The Defense believes that an additional continuance is warranted in order to continue discussions with the Government and with the Defendant.
6. That the Government has no objection to Defendant's request for a continuance.

Wherefore, Defendant requests that the Court continue this matter until its July trial term.

Respectfully submitted this 12th day of April, 2023.

s:/Rob Heroy

Attorney for Defendant

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CERTIFICATE OF SERVICE

I, Rob Heroy certify that on April 12, 2023, I filed the Defendant's Motion to Continue with the Clerk of the Court for the United States District Court for the Western District of North Carolina by using the CM/ECF system which will send notification to all other parties.

s:/Rob Heroy

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